

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
SNELL & WILMER L.L.P.
15 West South Temple, Suite 1200
Salt Lake City, UT 84101
Telephone: (801) 257-1900
Facsimile: (801) 257-1800
asorenson@swlaw.com

Kelly H. Dove, Esq.
Nevada Bar No. 10569
Gil Kahn, Esq.
Nevada Bar No. 14220
SNELL & WILMER L.L.P.
1700 South Pavilion Center Drive, Suite 700
Las Vegas, NV 89135
Telephone: (702) 784-5200
Facsimile: (702) 784-5252
kdove@swlaw.com
gkahn@swlaw.com

*Attorneys for Defendants Apartment Management
Consultants, LLC, and Rene Richardson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA *ex rel.*
PEGGY THORNTON, Relator,

and

PEGGY THORNTON,

Plaintiff,

vs.

PORTOLA DEL SOL OPERATOR, LLC, a
foreign limited-liability company; TMIF II
PORTOLA, LLC, a foreign limited-liability
company; APARTMENT MANAGEMENT
CONSULTANTS, LLC, a foreign limited
liability company; and RENE
RICHARDSON, as AGENT of PORTOLA
DEL SOL OPERATOR, LLC,

Defendants.

Case No. 2:21-cv-01123-APG-BNW

**Stipulation and Order to Extend Deadline
for Plaintiff Peggy Thornton and
Defendants Apartment Management
Consultants, LLC and Rene Richardson to
submit Reply supporting their Joint
Motion to Approve Settlement and
Distribution of Settlement Funds
[ECF No. 124]**

(Fourth Request)

Defendants Apartment Management Consultants, LLC and Rene Richardson (collectively “AMC”); Defendant TMIF II Portola, LLC (“TMIF”); Plaintiff-Relator Peggy Thornton; and Real Party in Interest the United States of America, by and through their respective undersigned counsel, hereby stipulate to extend Ms. Thornton and AMC’s deadline to submit their reply in support of their joint motion to approve settlement and distribution of settlement funds (“Joint Motion”) by 30 days until **May 1, 2025**, with the following background and reasons:

1. Ms. Thornton and AMC submitted the Joint Motion (ECF No. 124) on January 8, 2025.

2. As explained in the Joint Motion, Ms. Thornton and AMC have agreed on a settlement amount to resolve claims against the latter but required Court approval given that the United States had not stated whether it had any objection to the settlement terms.

3. The United States subsequently filed a partial objection to the Joint Motion, stating that it does *not* ultimately object to settlement or the settlement amount but requires any settlement to conform to its specifications, including distribution of settlement funds directly to the United States. ECF No. 128.

4. The United States, Ms. Thornton, and AMC have since conferred and agreed to jointly work on a written settlement agreement based on the Government’s specifications.

5. Because the settlement agreement will moot the need for the Court to approve the settlement and to accommodate the time needed to complete that agreement, the United States, Ms. Thornton, and AMC stipulated to extend the time for Ms. Thornton and AMC to reply to the Joint Motion to February 20, 2025. ECF Nos. 131-32.

6. Shortly after the Court approved that stipulation, TMIF submitted its own “limited opposition” to the Joint Motion. ECF No. 133.

7. To likewise accommodate drafting the settlement agreement, Ms. Thornton, AMC, and TMIF stipulated to extend Ms. Thornton and AMC’s reply deadline (with respect to TMIF’s limited opposition) to February 20, 2025 – thus aligning with the deadline as to the Government’s limited objection. ECF No. 134-35.

8. The Government circulated a proposed settlement agreement shortly thereafter, and prior to the last stipulated extension (ECF Nos. 138–39), AMC provided the Government with requested edits to the settlement agreement.

9. **Due to current staffing constraints, the Government has requested additional time to reconcile those edits and to finalize the settlement agreement.**

10. Accordingly, all parties and the United States agree to extend AMC and Ms. Thornton’s deadline to file a reply in support of the Joint Motion until May 1, 2025.

11. Ms. Thornton, AMC, TMIF, and the United States agree that this stipulation is entered into in good faith and will not unduly delay proceedings.

IT IS SO STIPULATED.

Dated: April 1, 2025

SNELL & WILMER L.L.P.

By: /s/ Gil Kahn

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
Kelly H. Dove, Esq.
Nevada Bar No. 10569
Gil Kahn
Nevada Bar No. 14220
1700 South Pavilion Center Drive,
Suite 700
Las Vegas, NV 89135

*Attorneys for Defendant Apartment
Management Consultants, LLC and Rene
Richardson*

Dated: April 1, 2025

NEVADA LEGAL SERVICES

By: /s/ Kristopher Pre

Kristopher Pre
Nevada Bar. No. 14106
530 South 6th Street
Las Vegas, Nevada 89101

Attorneys for Relator

Dated: April 1, 2025

U.S. ATTORNEY’S OFFICE
FOR THE DISTRICT OF NEVADA

By: /s/ Christian R. Ruiz

Sue Fahami
Acting United States Attorney
Nevada Bar. No. 5634
Christian R. Ruiz
Assistant United States Attorney
501 Las Vegas Blvd., So., Suite 1100
Las Vegas, Nevada 89101

*Attorneys for Real Party in Interest
the Unites States of America*

Dated: April 1, 2025

McDONALD CARANO LLP

By: /s/ Rory T. Kay

Rory T. Kay (NSBN 12416)
John A. Fortin (NSBN 15221)
Karyna M. Armstrong (NSBN 16044)
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102

Attorneys for Defendant TMIF II Portola, LLC

ORDER

Good cause appearing, Ms. Thornton and AMC's stipulation is **GRANTED**. Ms. Thornton and AMC's deadline to submit a reply in support of their Joint Motion (ECF No. 124), with respect to both the United States' partial objection (ECF No. 128) and TMIF's limited opposition (ECF No. 133), is extended to and including May 1, 2025.

IT IS SO ORDERED.



CHIEF UNITED STATES DISTRICT JUDGE

DATED: April 2, 2025

Snell & Wilmer

LLP
LAW OFFICES
1700 South Pavilion Center Drive, Suite 700
Las Vegas, Nevada 89135
702.784.5200